

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*Debtors.<sup>1</sup>

)  
 ) Chapter 11  
 )  
 ) Case No. 24-11967 (JKS)  
 )  
 ) (Jointly Administered)  
 )  
 ) **Re: D.I. 2808**  
 )

**ORDER APPROVING THE JOINT STIPULATION BY AND AMONG THE DEBTORS  
AND LIPP CDS, INC. RESOLVING MOTION OF LIPP CDS, INC. FOR LEAVE TO  
FILE PROOF OF CLAIM AFTER CLAIMS BAR DEADLINE**

Upon consideration of (1) the *Certification of Counsel Regarding Joint Stipulation by and Among the Debtors and Lipp CDS, Inc. Resolving Motion of Lipp CDS, Inc. for Leave to File Proof of Claim After Claims Bar Deadline* (the “Certification of Counsel”) and (2) the *Joint Stipulation by and Among the Debtors and Lipp CDS, Inc. Resolving Motion of Lipp CDS, Inc. for Leave to File Proof of Claim After Claims Bar Deadline* (the “Stipulation”),<sup>2</sup> by and between the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and Lipp CDS, Inc. (“Lipp CDS” and, together with the Debtors, the “Parties”), and which is attached to this order (this “Order”) as **Exhibit 1**; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin Granville Road, Columbus, OH 43081.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Stipulation in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Stipulation; and this Court having determined that the legal and factual bases set forth in the Stipulation establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Stipulation is approved in its entirety.
2. The Stipulation shall be binding on the Parties upon entry of this Order.
3. Any objections to the Motion not filed prior to the Motion Objection Deadline are deemed overruled and waived.
4. Lipp CDS may file a proof of claim (a “Lipp CDS Proof of Claim”) in the Chapter 11 Cases no later than fourteen (14) days following entry of this Order (such date, the “Extended Bar Date”).
5. Responses or objections to any Lipp CDS Proof of Claim must be filed no later than fourteen (14) days following the Extended Bar Date (the “POC Objection Deadline”). Any reply in support of a Lipp CDS Proof of Claim must be filed no later than fourteen (14) days following the POC Objection Deadline.
6. The Debtors’ rights to object to a Lipp CDS Proof of Claim on any grounds, or contest the validity or allowability of the allegations raised therein, are reserved in all respects.
7. To the extent the Debtors or any other party in interest file an objection to a Lipp CDS Proof of Claim, a hearing on such Lipp CDS Proof of Claim shall be scheduled no earlier

than twenty-one (21) days following the date on which such objection is filed.

8. Notwithstanding Bankruptcy Rule 6004, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Parties are authorized to take all actions necessary to effectuate the relief granted in this Order and to consummate and implement the terms and provisions of the Stipulation.

10. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order and the Stipulation.

**Exhibit 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:

BIG LOTS, INC., *et al.*

Debtors.<sup>1</sup>

---

)

)

)

)

)

)

)

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

---

**JOINT STIPULATION BY AND AMONG THE DEBTORS AND LIPP CDS, INC.  
RESOLVING MOTION OF LIPP CDS, INC. FOR LEAVE TO FILE PROOF OF CLAIM  
AFTER CLAIMS BAR DEADLINE**

---

This joint stipulation (“Stipulation”) is made and entered into by and among (a) debtor Big Lots, Inc., and the other debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), and (b) Lipp CDS, Inc (“Lipp CDS” and, together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

**RECITALS**

**WHEREAS**, on September 9, 2024 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the “Court”);

**WHEREAS**, on May 28, 2025, Lipp CDS, Inc. (“Lipp CDS”) filed the *Motion of Lipp CDS, Inc. for Leave to File Proof of Claim After Claims Bar Deadline* [D.I. 2808] (the “Motion”). The Motion sought, among other things, entry of an order extending the time by which Lipp CDS

---

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin Granville Road, Columbus, OH 43081.

may file a proof of claim in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) by thirty (30) days following entry of such order;

**WHEREAS**, the Debtors do not object on timeliness grounds to Lipp CDS’s request in the Motion to file a proof of claim in these Chapter 11 Cases after the January 31, 2025 bar date; and

**WHEREAS**, the Parties have agreed to settle any disputes with respect to the Motion through this Stipulation.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:**

1. The above recitals are incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.

2. This Stipulation shall be binding on the Parties upon the entry of an order so approving the Stipulation (such order, the “Order” and such approval date, the “Effective Date”).

3. Lipp CDS may file a proof of claim (a “Lipp CDS Proof of Claim”) in the Chapter 11 Cases no later than fourteen (14) days following entry of the Order (such date, the “Extended Bar Date”).

4. Responses or objections to any Lipp CDS Proof of Claim must be filed no later than fourteen (14) days following the Extended Bar Date (the “POC Objection Deadline”).

5. Any reply in support of a Lipp CDS Proof of Claim must be filed no later than fourteen (14) days following the POC Objection Deadline.

6. Notwithstanding anything to the contrary herein, the Debtors reserve their rights to contest the allegations raised in a Lipp CDS Proof of Claim on any grounds other than timeliness. Nothing contained herein should be deemed to constitute an admission regarding the validity or allowability of any Lipp CDS Proof of Claim that is timely filed prior to the Extended Bar Date or

any other claim asserted by Lipp CDS in these Chapter 11 Cases.

7. To the extent the Debtors or any other party in interest file an objection to a Lipp CDS Proof of Claim, a hearing on such Lipp CDS Proof of Claim shall be scheduled no earlier than twenty-one (21) days following the date on which such objection is filed, subject to, for the avoidance of doubt, the Court's availability for any such hearing.

8. Each of the Parties to this Stipulation represents and warrants it is duly authorized to enter into and be bound by this Stipulation.

9. This Stipulation may be executed in one or more counterparts and by electronic mail, each of which will be deemed an original but all of which together will constitute one instrument.

10. This Stipulation shall not be modified, altered, amended, or vacated without the written consent of both Parties hereto and order of the Court.

11. The Stipulation is intended by the Parties to be binding upon the Parties' successors, agents, and assigns, including any bankruptcy trustees and estate representatives, and any parent, subsidiary, or affiliated entity of the Parties.

12. This Stipulation shall be governed by, and construed in accordance with, the laws of the State of Delaware, except to the extent that the Bankruptcy Code applies.

13. The Parties acknowledge that this Stipulation is the joint work product of all of the Parties, and that, accordingly, in the event of ambiguities in this Stipulation, no inferences shall be drawn against any Party on the basis of authorship of this Stipulation.

14. The Court retains jurisdiction with respect to all matters arising from or related to this Stipulation and the interpretation, implementation, and enforcement thereof, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation.



**STIPULATED AND AGREED TO THIS 24TH DAY OF JUNE 2025:**

Dated: June 24, 2025  
Wilmington, Delaware

**SUSAN BARILICH, PC**

/s/ Susan Barilich

Susan Barilich  
535 N. Brand Blvd. Ste. 504  
Glendale, CA 91206  
Tel. 818-500-0377  
Fax: 800-850-7209  
Email: susan@barilichlaw.com

*Counsel to Lipp CDS*

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Casey B. Sawyer

Robert J. Dehney, Sr. (No. 3578)  
Andrew R. Remming (No. 5120)  
Daniel B. Butz (No. 4277)  
Sophie Rogers Churchill (No. 6905)  
Casey B. Sawyer (No. 7260)  
1201 N. Market Street, 16th Floor  
Wilmington, DE 19801  
Tel: (302) 658-9200  
rdehney@morrisnichols.com  
aremming@morrisnichols.com  
dbutz@morrisnichols.com  
srchurchill@morrisnichols.com  
csawyer@morrisnichols.com

*-and-*

**DAVIS POLK & WARDWELL LLP**

Brian M. Resnick (admitted *pro hac vice*)  
Adam L. Shpeen (admitted *pro hac vice*)  
Stephen D. Piraino (admitted *pro hac vice*)  
Kevin L. Winiarski (admitted *pro hac vice*)  
450 Lexington Avenue  
New York, NY 10017  
Tel.: (212) 450-4000  
brian.resnick@davispolk.com  
adam.shpeen@davispolk.com  
stephen.piraino@davispolk.com  
kevin.winiarski@davispolk.com

*Counsel to the Debtors and Debtors in Possession*